

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

PUREWICK CORPORATION,)	
)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 22-102-MN-JLH
)	
SAGE PRODUCTS, LLC,)	
)	
)	
Defendant.)	
)	

**DEFENDANT SAGE'S MOTION FOR TELECONFERENCE
TO RESOLVE DISCOVERY DISPUTES**

Pursuant to D.I. 84, Defendant Sage respectfully moves this Court to schedule a teleconference to address its outstanding disputes regarding the following discovery matters:

1. Sage's request that the Court order PureWick to provide, by a date certain, the third-party and PureWick documents previously ordered produced in this Court's January 6, 2023 Discovery Order (1/6/23 Tr. at 24-27; 39-40).
2. Sage's motion to compel PureWick to produce a witness to testify regarding Topic Nos. 1-6, 8, 10-12, 16, 17, 19, 21, 22, 24, 27, 29-31, and 39 in Sage's First and Second Rule 30(b)(6) Deposition Notices of PureWick, including topics already within the scope of the Court's January 6, 2023 Order.
3. Sage's motion to compel PureWick to supplement and/or certify the accuracy of its responses to Sage's interrogatories from the *PureWick I* matter that bear on the issues in this case including, e.g., Interrogatory Nos. 5, 6, 12, 15, and 16, which may be used in this matter pursuant to Paragraph 8 of the Scheduling Order. (D.I. 20 at 3.)

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in verbal meet-and-confer teleconference on January 24, 2023.

Delaware Counsel:

- Plaintiff: Karen E. Keller, Shaw Keller LLP
- Defendant: Samantha G. Wilson, Young Conaway Stargatt & Taylor, LLP

Lead Counsel:

- Plaintiff: Nicola R. Felice and Jason C. Williams, Quinn Emanuel Urquhart & Sullivan, LLP
- Defendant: Ryan J. Pianetto and Christopher M. Scharff, McAndrews, Held & Malloy, Ltd.

The parties are presently available for a teleconference February 24, 27, and 28.

Dated: February 7, 2023

Of Counsel:

Robert A. Surrette
Sandra A. Frantzen
Deborah A. Laughton
Christopher M. Scharff
Ryan J. Pianetto
McAndrews, Held
& Malloy, Ltd
500 West Madison Street, 34th Floor
Chicago, IL 60661
(312) 775-8000
bsurrette@mcandrews-ip.com
sfrantzen@mcandrews-ip.com
dlaughton@mcandrews-ip.com
cscharff@mcandrews-ip.com
rpianetto@mcandrews-ip.com

YOUNG CONAWAY STARGATT
& TAYLOR, LLP

/s/ Samantha G. Wilson
Anne Shea Gaza (No. 4093)
Samantha G. Wilson (No. 5816)
Rodney Square
1000 North King Street
Wilmington, DE 19801
(302) 571-6600
agaza@ycst.com
swilson@ycst.com

Attorneys for Sage Products, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 7, 2023, a copy of the foregoing document was served on counsel listed below in the manner indicated:

BY E-MAIL

John W. Shaw
Karen E. Keller
Andrew E. Russell
Shaw Keller LLP
I.M. Pei Building
1105 North Market Street, 12th Floor
Wilmington, DE 19801
jshaw@shawkeller.com
kkeller@shawkeller.com
arussell@shawkeller.com

Athena Dalton
Quinn Emanuel Urquhart & Sullivan, LLP
191 N. Wacker Drive, Suite 2700
Chicago, IL 60606
athenadalton@quinnmanuel.com

Jared W. Newton
Quinn Emanuel Urquhart & Sullivan, LLP
1300 I Street NW, 9th Floor
Washington, DC 20005
jarednewton@quinnmanuel.com

purewick-sage-qe@quinnmanuel.com

Steven C. Cherny
Brian P. Biddinger
Matthew A. Traupman
Raymond Nimrod
Jason C. Williams
Nicola R. Felice
Bianca Fox
Quinn Emanuel Urquhart & Sullivan, LLP
51 Madison Avenue, 22nd Floor
New York, NY 10010
stevencherny@quinnmanuel.com
brianbiddinger@quinnmanuel.com
matthewtraupman@quinnmanuel.com
raynimrod@quinnmanuel.com
jasonwilliams@quinnmanuel.com
nicolafelice@quinnmanuel.com
biancafox@quinnmanuel.com

John Yang
Quinn Emanuel Urquhart & Sullivan, LLP
3100 McKinnon St., Suite 1125
Dallas, TX 75201
johnyang@quinnmanuel.com

**YOUNG CONAWAY STARGATT
& TAYLOR, LLP**

/s/ Samantha G. Wilson
Anne Shea Gaza (No. 4093)
Samantha G. Wilson (No. 5816)
Rodney Square
1000 North King Street
Wilmington, DE 19801
(302) 571-6600
agaza@ycst.com
swilson@ycst.com

Attorneys for Sage Products, LLC